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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

United States of America.,

Plaintiff,

12 | VS.

13 Leon W. Lipson, in his capacity as Personal
14 Representative of the Estate of Jean Lipson;
15 Leon W. Lipson, in his capacity as Trustee of
the Jean Lipson Trust; Nadine Lipson, in her
capacity as Trustee of the Jean Lipson Trust;
16 Nadine Lipson, in her capacity as Personal
Representative of the Estate of David E. Lipson;
17 Nadine Lipson, individually,

Defendants.

Case No: 2:23-cv-00127-JCM-DJA

STIPULATION TO EXTEND TIME TO
FILE REPLY TO OPPOSITION TO
DEFENDANTS' SECOND MOTION
FOR SUMMARY JUDGMENT
(First Request)

Pursuant to LR IA 6-1, Plaintiff the United States of America and Defendants Leon W. Lipson, in his capacity as Personal Representative of the Estate of Jean Lipson and in his capacity as a Trustee of the Jean Lipson Trust, and Nadine Lipson, individually and in her capacity as Personal Representative of the Estate of David E. Lipson (collectively, the “Parties”), stipulate and move the Court to extend by one week the deadline for Defendants to reply to the United States’ Response to Defendants’ Section Motion for Summary Judgment, which was filed on November 22, 2024. See Dkts. 41 (Defendants’ Second Motion for

1 Summary Judgment); 47 (United States' Response to Defendants' Section Motion for Summary
2 Judgment).

3 This is Defendants' first request for an extension of deadline with respect to the pending
4 summary judgment motion, and it is made before the expiration of the deadline. Defendants
5 seek only to extend the deadline for the Defendants to file a reply to United States' Response to
6 Defendants' Section Motion for Summary Judgment. The current deadline for Defendants'
7 reply to the response is December 6, 2024.

9 Defendants do not seek the requested extension to hinder or delay this action. Rather, the
10 extension is sought in good faith and to take into account the intervening holidays in November
11 and December, as well as the long-planned family vacation of Defendants' counsel in early
12 December. The requested extension will allow Defendants to prepare a more complete and
13 appropriate reply. One additional week is necessary to allow Defendants to prepare a more
14 complete and appropriate reply. The United States does not oppose the Defendants' requested
15 extension.

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1 For the above reasons, and for good cause shown, the Parties therefore seek that the
2 current deadline for Defendants' reply in support of its Second Motion for Summary Judgment
3 be extended by one week to December 13, 2024.
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5 Respectfully submitted this 26th day of November, 2024,

6 DAVID A. HUBBERT
7 Deputy Assistant Attorney General

8 /s/ *Yen Jeannette Tran*

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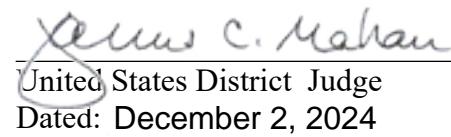
16 *Attorneys for Plaintiff*

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17 IT IS SO ORDERED:

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20 United States District Judge
21 Dated: December 2, 2024